

# S \_ C I A L M O B I L I T Y F \_ U N D A T I O N ®

## SMF PRIVACY NOTICE

### Introduction

We take your privacy seriously. This Privacy Notice explains what personal information we collect, when and why we collect it, how we use it, how long we keep it, the conditions under which we may share it with others, how we keep it secure and your rights. In this Privacy Notice, "personal information" or "personal data" means information that (either in isolation or in connection with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include your name, company name, postal address, email address, phone number, payment information, details of the preferences you express to us, your comments and questions, and technical information from the devices you use to access our website.

Please click below to find out more:

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**Who are we and how can you contact us**

References to "our", "us", "we" or "SMF" within this Privacy Notice are to The Social Mobility Foundation.

The Social Mobility Foundation (SMF) is a charity (Registered Charity No. 1115888) which aims to make a practical improvement in social mobility for young people from low-income backgrounds.

If there is anything you are unsure about in this Privacy Notice or if you have any questions about the privacy policies and practices of SMF or our service providers, feel free to contact us by email at [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or by post at The Social Mobility Foundation, 1st and 2nd floor, 43-47 Leadenhall Market, London, EC3V 1LR.

SMF is responsible for processing the personal information you provide to us or that we collect from other public sources and is data controller of the data covered by this Privacy Notice under applicable data protection laws.

**What type of personal data do we collect?**

SMF collects and uses the types of data listed below so that we can run the charity and deliver the Aspiring Professionals Programme in accordance with our legitimate interests.

To find out more about which types of data we collect please read the relevant heading(s) below:

**Students**

We collect your name, photo, home contact information (address and telephone number), date of birth, gender, family status, educational details (including the name of your school/college and previous school(s)/college(s), any qualifications attained, predicted grades, and any free school meal and/or household income data), details relating to any work experience or job that you may have had or will have (including salary information), personal interests and academic/career aspirations. We may also collect special category data (as defined by applicable data protection laws) from you. This includes information about your ethnic origin and any disabilities or medical conditions you may have.

**Family members/guardians/emergency contacts**

We collect your name, contact information (address, email address and telephone number), educational history and information relating to free school meals and household income.

**Teachers, other education organisations and contacts, charities, employers and volunteers including mentors**

We collect information which may include your name, contact information, employment information, information and opinions relating to your relationship with the SMF or student (for teachers) and information provided to the Social Mobility Foundation by organisations that may perform background checks on you from time to time (including, for volunteers, without limitation, the Criminal Records Bureau and the Independent Safeguarding Authority).

### **Donors**

We collect information which may include your name, contact information, employment information and bank details.

### **Job Applicants and Employees**

Please click [here](#) to read about how we collect, process and look after the data of job applicants and employees.

### **Suppliers and other related organisations**

We collect information which may include your name, contact details and bank information.

### **Website users**

When you visit our website, we (and our service providers) may use cookies and other technologies to automatically collect the following information:

- Technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times and download errors;
- information about your visit, including the websites you visit before and after our website and items you viewed or searched for; and
- length of visits to certain pages, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page.

To learn more about how we use cookies and how to control which cookies are used, please see our Cookie Policy available [here](#).

### **Why do we collect and use personal data?**

The Social Mobility Foundation collects and uses Personal Information for reasons related to meeting the aims for the organisation.

To find out more about how SMF may use your information please read the relevant heading(s) below:

### **Students**

To process your application for a place on our programme, to run the programmes, track your involvement and offer you opportunities, undertake analysis, research and evaluation about our work, *promotional purposes*, to review career progression, and to provide you with any necessary support.

### **Family members/guardians/emergency contacts**

To contact you in case of an emergency, promotional purposes and to undertake analysis, research and evaluation about our work.

### **Teachers, other education organisations and contacts, charities, employers and volunteers including mentors**

To process your information as a referee/volunteer or mentor/internship provider (as the case may be), to run our programmes, promotional purposes, and to undertake analysis, research and evaluation about our work.

### **Donors**

To process your information as a donor, thank you, for information giving and promotional purposes, and to undertake evaluation about our work.

### **Applicants for employment with SMF and employees**

Please click [here](#) to read about how we collect, process and look after the data of job applicants and employees.

### **Suppliers and other commercial partners**

To enable SMF to do business with you or your organisation, track payments and interactions and undertake other administrative tasks.

### **When do we collect personal data about you?**

We collect information directly from you when you are engaging with, participating in, supporting or volunteering in the Aspiring Professionals Programme.

We also collect information directly from you when you interact with us in person, through email and written correspondence, by phone, by social media, or through our website or third party social media websites.

We may collect personal information about you from third party sources. This may be through members of our programmes (e.g. individuals providing emergency contact details) or from other legitimate sources, such as public sources or social networks.

### **Our legal basis for processing personal data**

#### **Collecting personal data based on legitimate interest**

Most of the personal data we use is processed by us on the basis of our legitimate interest. This legitimate interest is primarily related to the delivery of the Aspiring Professionals Programme. It is in our legitimate interest to process personal data required for the running of this programme and for carrying out our day to day operations as an organisation.

#### **Collecting personal data based on consents**

Some of the personal data we collect will be based on consent. The collection of personal data based on consent from the data subject will be done by using "Consent Forms" that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems. We rely on consent as a legal basis for marketing/fundraising communications which fall outside our core programme activity.

#### **Collecting personal data based on contracts**

Where we have a contract with you or your employer, we will process your personal information in order to fulfil our obligations related to such contracts and agreements with commercial partners and suppliers.

#### **Collecting special category data**

As part of the personal data we process, we may collect special category data (as defined by applicable data protection laws) from students on application to the Aspiring Professionals Programme or for specific events and activities in the case of health information. This includes information about your ethnic

origin (collected pursuant to significant public interest) and any disabilities or medical conditions you may have (collected for health emergency and/or occupational health reasons).

#### **Collecting personal data based on other grounds**

We may occasionally keep your personal data in order to comply with our legal obligations, resolve any disputes and enforce our rights.

#### **Who has access to your personal data?**

Within the Social Mobility Foundation, access to your personal information is restricted to the employees of the Social Mobility Foundation on a need-to-know basis or as required by law. We may also share your personal data with third parties in certain circumstances as detailed in the section 'Do we share your data with anyone?' below.

#### **How long do we keep it?**

We will only retain your personal data for as long as it is necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. When we no longer need to use your information, we will remove it from our systems and records and / or take steps to promptly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

In all cases, our need to use your personal information will be reassessed on a regular basis, and information which is no longer required for any purposes will be disposed of safely.

#### **Your rights to your personal data**

It is important that you understand your rights in relation to your Personal Information and how you can contact us if you have questions or concerns.

If you have any questions, comments or concerns about how we handle your Personal Information, then you may contact us by sending an email to [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or go to [www.socialmobility.org.uk](http://www.socialmobility.org.uk) and complete a *Contact Us* form.

You have various rights in connection with our processing of your personal information, each of which is explained below.

- **Access.** You have the right to request a copy of the personal information we are processing about you, which we will provide back to you in electronic form where appropriate. For your own privacy and security, in our discretion we may require you to prove your identity before providing the requested information.
- **Rectification.** You have the right to have incomplete or inaccurate personal information that we process about you rectified.
- **Deletion.** You have the right to request that we delete personal information that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular

purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it. In such case, we would mark stored personal information with the aim of limiting particular processing for particular purposes in accordance with your request, or otherwise restrict its processing.

- **Portability.** You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal information which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you.
- **Objection.** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. If you would like to withdraw consent, including if you would like to opt out of receiving marketing correspondence from us, please contact us at [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or for marketing follow the unsubscribe instructions located in the email (as relevant). Please note that if you do request that we stop sharing your personal information with third parties for their direct marketing purposes, it is also prudent that you opt out from or contact that third party directly.
- **Make a Complaint.** You have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, the UK, the Information Commissioner's Office can be contacted as follows:  
**Telephone:** +44 0303 123 1113  
**Email:** [casework@ico.org.uk](mailto:casework@ico.org.uk)  
**Website:** [www.ico.org.uk](http://www.ico.org.uk)  
**Web-form:** [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/)  
**Address:** Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

Note that the rights outlined above only extend to personal information.

To help us to deal with your request, please always provide your full name and contact information.

To help us to maintain accurate Personal Information, you must advise us of any changes to your Personal Information. In the event that the Social Mobility Foundation becomes aware of any inaccuracy in the personal information that the Social Mobility Foundation has recorded, the Social Mobility Foundation will correct that inaccuracy at the earliest practical opportunity.

## Security

We have implemented technical and organisational security measures in an effort to safeguard personal information in our custody and control. Such measures we have implemented include, limiting access to personal information only to employees and authorised service providers who need to

know such information for the purposes set out in this Privacy Notice, as well as other technical, administrative and physical safeguards.

While we endeavour to always protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

**Do we share your data with anyone?**

We share your data for specific reasons only, mainly related to delivering and carrying out research into the Aspiring Professionals Programme.

We may share your personal information with the following third party organisations:

- External auditors;
- Service providers, including the following:
  - Infrastructure and IT service providers;
  - Marketing, advertising and communications agencies;
  - Academic institutions or similar to enable SMF to conduct research to improve the APP and/or for the public interest
- Our strategic partners, subject to your consent;
- Third parties permitted by law (for example, where required to disclose certain information to comply with a legal or regulatory obligation).

We may also share your personal information as set out under the relevant heading(s) below:

**Students**

We may share your personal information with your teachers, your parents, the organisations with which we place you (or propose to place you), organisations you wish to apply to or are applying to for employment, your mentors, prospective supporters (e.g. charitable trusts), researchers and current funders of the Social Mobility Foundation.

**Family members/guardians**

We may share your personal information with the organisations in which we place your family member/ward (or propose to place your family member/ward) or in case of emergency with organisations involved.

**If required by law:**

We will disclose your personal information if required by law or if we, as an organisation, reasonably believe that disclosure is necessary to protect our organisation's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

**Where in the world do we send Personal Information?**

The Social Mobility Foundation has taken steps to set up appropriate data protection and information security requirements with organisations/ recipients to confirm that personal information is properly protected in accordance with this Privacy Notice and applicable laws. If necessary and in accordance with applicable laws, the Social Mobility Foundation may disclose personal

information to our outside professional advisers and to other third parties that provide products or services to the Social Mobility Foundation, such as IT systems providers, trainers and consulting firms.

Where the processing of personal information is delegated to a third party data processor, such as those listed above, the Social Mobility Foundation will choose a data processor that provides sufficient guarantees about the technical and organisational security measures governing the relevant processing and will ensure that the processor acts on our behalf and under our instructions.

Where your personal information is processed outside the EEA, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the personal information.

**For students, family members/guardians, emergency contacts, teachers, employers, volunteers and mentors:**

Most of the recipients of the personal information that the Social Mobility Foundation collects from you will be located in the United Kingdom. However, some of your personal information may be transferred to servers located in the United States of America for the purposes of securely storing this information.

**Changes to this Privacy Notice**

We may update this Privacy Notice at any time and ideally you should check it regularly for updates. We won't alert you to every minor change, but if there are any really important changes to the Privacy Notice or to how we use your information we'll let you know.

**Your right to complain**

If you are unhappy with the way in which your personal data has been processed, in the first instance, contact us by email at [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or by post at The Social Mobility Foundation, 1st and 2nd floor, 43-47 Leadenhall Market, London, EC3V 1LR.

If you remain dissatisfied, then you have the right to complain to the supervisory authority as set out in the section above entitled 'Your rights in relation to your personal data'.